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8 *Attorneys for Defendants*
9 *Nature's Value, Inc., and*
Richard Persaud

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JANE DOE,

13 Plaintiff,

14 v.

15 NATURE'S VALUE, INC., RICHARD
16 PERSAUD, and DOES 1 THROUGH 20,
17 Defendants.

Case No.: 2:18-cv-370-RFB-GWF

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEFENDANTS'
OPPOSITION TO MOTION TO QUASH
SUBPOENA DUCES TECUM ISSUED
TO AT&T MOBILITY (ECF NO. 24),
AND CONTINUING HEARING

18 Defendants Nature's Value, Inc. and Richard Persaud ("Defendants"), by and through their
19 counsel of record, Jackson Lewis P.C., and Interested Parties Amber Breen, Ian Breen, and Fuller
20 Enterprises USA, Inc. ("Fuller") (together, the "Fuller Parties") (collectively, Defendants and the
21 Fuller Parties shall be referred to as the "Parties"), by and through their counsel of record, Rempfer
22 Mott Lundy, PLLC and Michael Aaron Harwin, P.C., hereby stipulate as follows:

23 1. On or about August 9, 2018, Defendants served a subpoena *duces tecum* seeking
24 certain information and records from AT&T Mobility, LLC regarding cellular telephone numbers
25 (760) 448-0550 and (562) 277-8442 (the "Subpoena"). ECF No. 24, pp. 79-82.

26 2. On August 29, 2018, the Fuller Parties filed a Motion to Quash the Subpoena. ECF
27 No. 24.

28 3. Defendants' Opposition to the Motion is due on September 12, 2018.

1 4. The Motion to Quash is scheduled to be heard on Tuesday, September 25, 2018 at
2 10:30 a.m. ECF No. 25.

3 5. Since the filing of the Motion, the Parties have continued to meet and confer
4 regarding the Fuller Parties' objections to the Subpoena.

5 6. Based on these ongoing discussions, the Parties believe that with additional time,
6 they may be able to resolve the dispute presented in the Motion to Quash.

7 7. In furtherance thereof, the Fuller Parties have consented to allow Defendants an
8 extension of time to submit their Opposition to the Motion to Quash to Friday, September 28, 2018.

9 8. Due to the extension of time and ongoing discussions, the Parties request that the
10 Court continue the hearing on the Fuller Parties' Motion to Quash currently scheduled for Tuesday,
11 September 25, 2018 at 10:30 a.m.

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1 9. The Parties have conferred on their availability for the continued hearing and believe
2 that they are available on October 24th through October 26th, October 31st, and November 7th and 8,
3 2018. However, counsel for the Fuller Parties, Michael A. Harwin, maintains a busy criminal
4 practice and may have hearings and/or other court proceedings scheduled on short notice that cannot
5 be moved. Any such issues will be brought to the Court's attention as necessary.

6 Dated this 12th day of September, 2018.

7 JACKSON LEWIS P.C.

8 MICHAEL AARON HARWIN, P.C.

9 /s/ Joshua A. Sliker

10 /s/ Michael A. Harwin

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24 Attorneys for Interested Parties Amber Breen,
25 Ian Breen, and Fuller Enterprises USA, Inc.

26 **IT IS SO ORDERED.**

27 Dated: 9-13-2018

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 U.S. MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee Jackson Lewis P.C. and that on this 12th day of September, 2018, I caused to be sent via electronic filing, a true and correct copy of the above and foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANTS' OPPOSITION TO MOTION TO QUASH SUBPOENA DUCES TECUM ISSUED TO AT&T MOBILITY (ECF NO. 24), AND CONTINUING HEARING** properly addressed to the following:

Joel Selik SELIK LAW OFFICES 1050 Indigo Drive Suite 112 Las Vegas, Nevada 89145 joel@seliklaw.com <i>Attorneys for Plaintiff</i>	Joseph N. Mott Scott E. Lundy REMPFER MOTT LUNDY, PLLC 10091 Park Run Drive Suite 200 Las Vegas, Nevada 89145 joey@rmllegal.com scott@rmllegal.com <i>Attorneys for Fuller Enterprise USA, Inc., Ian Breen, and Amber Breen</i>
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/s/ Joshua A. Sliker
Employee of Jackson Lewis P.C.